

Exhibit A

Mitchell Nobel

From: Campbell, Eamonn W. <ecampbell@omm.com>
Sent: Tuesday, November 15, 2022 6:51 PM
To: Mitchell Nobel; Greg Hollon; Rudzin, Abby F.; Timothy B. Fitzgerald
Cc: Lisa Nelson; Elisabeth J. Guard; Matt Monkress; Tether Team
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Mitchell,

The RFPs you cite don't support the broad search term that you want us to run. In response to RFP 2 we agreed only to produce documents sufficient to show any agreement Bittrex has with Bitfinex, which we will do. RFPs 20 and 21 are about USDT, so the limiter we proposed is appropriate. We did not agree to produce any documents in response to RFP 45, so an email search is not required for that request. We disagree with the other parts of your email, including that the term would not impose a burdensome review on Bittrex.

We are beginning our review with the limiter we proposed on that term.

Best,
Eamonn

Eamonn W. Campbell
O: +1-212-728-5878
ecampbell@omm.com

From: Mitchell Nobel <mnobel@selendygay.com>
Sent: Monday, November 14, 2022 4:51 PM
To: Campbell, Eamonn W. <ecampbell@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Eamonn,

We do not agree that our proposed search term is in any way irrelevant. Plaintiffs allege (among other things) an anticompetitive conspiracy between Bittrex and Bitfinex to manipulate the crypto asset markets. Documents mentioning "trades" or "transactions" between or among the two exchanges therefore go to the heart of both Plaintiffs' allegations, e.g. Compl. ¶¶ 310-16, 331-334, and Plaintiffs' RFPs, e.g., Nos. 2, 20, 21 45. We also do not understand your objection that the proposed search term might "pull[] in documents" that you consider irrelevant. That argument could be made about any search term.

We also do not agree that our proposed search is burdensome. Though you have not provided a hit report or a precise document count (as we requested), we understand you to be representing that the search would add at most a few thousand documents to the review population. You have not explained why that marginal burden would be disproportionate given the stakes of the litigation and the scope of discovery the parties have already agreed to undertake.

We therefore hope Bittrex will reconsider its position and agree to run our proposed search term. If not, we will consider the parties to be at impasse, and Plaintiffs reserve all rights.

Best regards,

Mitchell

Mitchell Nobel

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Campbell, Eamonn W. <ecampbell@omm.com>

Sent: Friday, November 11, 2022 9:20 AM

To: Mitchell Nobel <mnobel@selendygay.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Notice: This email originated from outside of the organization. Please use caution before opening any attached file you did not expect from the sender. Contact support@langtech.com if in doubt.

Mitchell,

Rule 26 permits discovery of only those documents that are relevant to a party's claim or defense and requires discovery to be proportional to the needs of the case. The first string as you've constructed it does not seek only relevant materials and is not proportional because it will pull in many documents that have nothing to do with any party's claim or defense. Bittrex and Bitfinex are both cryptocurrency exchanges, and it is unremarkable and not relevant that Bittrex has documents that mention "trades" or "transactions" and Bitfinex. With no tie to Tether or USDT, the string is improperly pulling in documents that Bittrex has not agreed to produce and that are not relevant. If there is some RFP we've missed that calls for documents about trading on the Bitfinex exchange generally, please point us to it.

We ran the string as you requested. It generates an additional 1,536 unique hits and 117 additional Slack transcripts, which would require Bittrex to review not only those unique hits and transcripts but also their associated family members. As you presumably know by now, Slack transcripts are often dozens of pages long, so these 117 additional transcripts likely carry an equal burden of another thousand documents to review. There is no basis to impose this burden on Bittrex.

We think our modification of the string is a fair compromise, especially given our willingness to run the second string in your email unmodified, to include the four additional custodians you insisted on just a few weeks ago, and to search for documents over the extended time period. We think it unlikely you will be able to convince the Court that Bittrex's capitulation on everything else, yielding tens of thousands of documents to be reviewed, is insufficient, much less that it is appropriate to require a crypto exchange to review every single document mentioning trading on another crypto exchange.

Eamonn W. Campbell
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From: Mitchell Nobel <mnobel@selendygay.com>
Sent: Thursday, November 10, 2022 11:57 AM
To: Campbell, Eamonn W. <ecampbell@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Eamonn,

The removal of the Tether terms from the first string was not inadvertent – it was a reaction to your comments in our most recent meet and confer that we should disaggregate the Tether and Bitfinex terms. If Bittrex is unwilling to run this term, it should identify the basis for that objection. To the extent you object on the basis of burden, please provide hit reports showing the differential in burden between our proposed term and the version in your November 7, 2022 email, in the context of the other undisputed requests.

Best regards,

Mitchell

Mitchell Nobel

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Campbell, Eamonn W. <ecampbell@omm.com>
Sent: Monday, November 7, 2022 5:42 PM
To: Mitchell Nobel <mnobel@selendygay.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Mitchell:

It appears that you inadvertently removed the Tether terms from the first string -- we're obviously not reviewing every document that merely mentions trading or transacting on the Bitfinex exchange without any connection to the case. Thus, the first string should be: ((Bitfinex OR *@bitfinex) AND (Tether OR USDT)) w/15 (print* OR issue* OR creat* OR mint* OR new* OR agree* OR trad* OR transact* OR back*).

With that correction, we agree to your final requests and will begin the review.

Best,
Eamonn

Eamonn W. Campbell
O: +1-212-728-5878
ecampbell@omm.com

From: Campbell, Eamonn W.
Sent: Friday, November 4, 2022 1:42 PM
To: 'Mitchell Nobel' <mnobel@selendygay.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Thank you, Mitchell. We will get back to you.

Best,
Eamonn

Eamonn W. Campbell
O: +1-212-728-5878
ecampbell@omm.com

From: Mitchell Nobel <mnobel@selendygay.com>
Sent: Friday, November 4, 2022 1:19 PM
To: Campbell, Eamonn W. <ecampbell@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Eamonn,

As per our discussion earlier yesterday, we would propose that the first term discussed in my email of November 1 be replaced with the two terms below:

(Bitfinex OR *@bitfinex) w/15 (print* OR issue* OR creat* OR mint* OR new* OR agree* OR trad* OR transact* OR back*)
(Tether OR USDT) w/7 (back* OR debase* OR fals* OR fraud* OR mint* OR burn* OR manip* or pump).

The latter of these terms would replace the term "Unback* w/5 Tether" from your most recent proposal.

I understand from our conversation that, if we can reach agreement on this issue, Bittrex will agree to review documents responsive to the other term I identified in my November 1 email and review through the expanded date range.

Best regards,

Mitchell

Mitchell Nobel
Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Mitchell Nobel

Sent: Wednesday, November 2, 2022 6:35 PM

To: Campbell, Eamonn W. <ecampbell@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Eamonn,

We are available at 5 EDT tomorrow; I will circulate an invite now. We look forward to speaking with you.

Best regards,

Mitchell

Mitchell Nobel

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Campbell, Eamonn W. <ecampbell@omm.com>

Sent: Wednesday, November 2, 2022 4:27 PM

To: Mitchell Nobel <mnobel@selendygay.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Mitchell – We are available to meet and confer tomorrow at 5 or 5 30 pm EDT or Friday between noon and 3 30 pm EDT.

Best,
Eamonn

Eamonn W. Campbell

O: +1-212-728-5878

ecampbell@omm.com

From: Mitchell Nobel <mnobel@selendygay.com>

Sent: Tuesday, November 1, 2022 12:35 PM

To: Campbell, Eamonn W. <ecampbell@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Eamonn,

We believe it would be productive to meet and confer regarding this proposal – please let us know when this week you are available.

In order to make the meet and confer as productive as possible, I am identifying three issues we have with your current proposal:

- Your revisions condensed several search terms into the following term: : (*@bitfinex AND (Tether or USDT)) w/15 (print* OR issue* OR creat* OR mint* OR new* OR agree* OR trad* OR transact* OR back*). This term inappropriately uses “@bitfinex” as a limiter. We would propose the following revision: ((Bitfinex OR *@bitfinex) OR (Tether or USDT)) w/15 (print* OR issue* OR creat* OR mint* OR new* OR agree* OR trad* OR transact* OR back*)
- You removed the term “call w/3 (me OR you) w/15 (USDT or Tether)”. This term produced 2 unique hits, which cannot be described as burdensome. We see no basis for this term’s removal.
- Your email asks us to explain why documents after October 2019 are relevant. As I have explained, our amended complaint alleges events through the date of its filing in June 2020 and the class period extends through the present. We briefed this exact issue when the B/T Defendants similarly sought to limit production to documents prior to the filing of the original complaint – our letter motion to compel on that issue is attached. As you know, the Court ordered the B/T Defendants to produce through June 2020.

Additionally, the attachments to your email of October 28 included Anonymous Trader information but was sent to TetherTeam@schneiderwallace.com, which, as I specifically mentioned in my email of October 18, goes to both attorneys and non-attorneys. Please send emails containing Anonymous Trader information only to TetherLawyers@schneiderwallace.com, which goes only to attorneys, or to specific attorneys. We have instructed all non-attorneys who received your email to delete it and its attachments.

Best regards,

Mitchell

Mitchell Nobel

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Campbell, Eamonn W. <ecampbell@omm.com>

Sent: Friday, October 28, 2022 1:18 PM

To: Greg Hollon <GHollon@mcnaul.com>; Mitchell Nobel <mnobel@selendygay.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Counsel:

We write in response to your October 12 letter and the search term proposal included in Appendix A to your letter. The search terms are on their face overbroad and many do not even appear to be designed to legitimately target documents Bittrex has agreed to produce. Nevertheless, we have run your proposed terms again as a courtesy – over the original custodians and the four additional custodians you demanded for the first time in your letter – and as you can see from the attached hit reports, they yield an unreasonable number of documents to be reviewed.

At this point, we are not going to waste time running another set of scores of inappropriate searches. We have come up with the attached compromise proposal, which would require Bittrex to review nearly 20,000 ordinary documents and more than 500 individual Slack transcripts (which require lengthy, intense review because they are often dozens of pages of text). Please let us know if it is acceptable to Plaintiffs and, if not, what specific edits Plaintiffs would suggest. Note that there are several places where we consolidated overlapping searches – i.e., some searches have been dropped and the key terms incorporated into other searches. The counterproposal and hit reports are attached. Most of the edits should be self-explanatory, but let us know if you have specific questions.

Plaintiffs' claim that several of Bittrex's term revisions are "incongruent" with "prior agreements" Bittrex made is not well taken. As our July 15 letter states, Bittrex provided an "initial response" to Plaintiffs' search-term proposal. Bittrex did not "agree" to those searches, and we certainly did not agree to those searches alongside an additional four custodians and dozens of other search terms to which Bittrex objected. Good-faith negotiations do not call for one side to insist on the parts it likes from a counterproposal as an "agreement" and reject the parts it does not—the parties reach one comprehensive agreement reflecting compromises from both sides. Our counterproposal reflects an attempt to reach such an agreement.

As to your other questions:

- We cannot give you the membership of the "Coin Team" listserv, because it changed over time. Our understanding is that many of the custodians were on the team, so documents sent to the listserv would be captured.
- Bittrex confirms that it does not have any data from any other messaging platforms in its possession, custody, or control that are likely to be within the scope of what Bittrex has agreed to produce.
- On the expanded date range, there is no reason to run Plaintiffs' proposal over it, since the proposal is a non-starter for the shorter date range. For our counterproposal, the expanded date range yields approximately 2,000 additional documents and 100 additional Slack transcripts. Plaintiffs need to explain why the additional documents are reasonably likely to be relevant before Bittrex will take on this additional burden.

Please let us know if you would like to schedule another meet-and-confer.

Eamonn W. Campbell
O: +1-212-728-5878
ecampbell@omm.com

From: Greg Hollon <GHollon@mcnaul.com>
Sent: Tuesday, October 25, 2022 9:04 PM
To: Mitchell Nobel <mnnobel@selendygay.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

We should have a response out this week. As I mentioned previously, Plaintiffs' belated addition of additional custodians delayed the process.

Regards, Greg

Juhjru| #M# rørg#D wæugh|



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From: Mitchell Nobel <mnnobel@selendygay.com>
Sent: Tuesday, October 25, 2022 2:14 PM
To: Greg Hollon <GHollon@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Please let us know when you will have a more substantive response to the letter we sent on October 12. As you are aware, the extended substantial completion deadline has now passed, and Bittrex has still not provided a substantive response on this proposal.

Best regards,

Mitchell

Mitchell Nobel

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Greg Hollon <GHollon@mcnaul.com>

Sent: Wednesday, October 19, 2022 12:28 PM

To: Mitchell Nobel <mnobel@selendygay.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Mitchell,

Thanks for your email. Since Plaintiffs' counterproposal included new proposed custodians, we have had to go back and pull the data for those individuals and are in the process of getting it uploaded to Haystack. After we have completed that process and run new hit reports we will get back to you with a response. Just FYI, there seems to have been some confusion over the date range for which we are pulling data. To be clear, we are pulling data from the custodians for the period from February 1, 2015 through June 5, 2020. However, as we have previously discussed, we have not yet agreed to that period for the searches—we still need to determine volume and still reserve the right to carve back the date range for the searches depending on the volume of hits for the various search terms. We'll get back to you with a more substantive reply after we complete the process of uploading the additional custodian data and running the search terms against the expanded universe of data.

Regards, Greg

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From: Mitchell Nobel <mnobel@selendygay.com>

Sent: Tuesday, October 18, 2022 3:04 PM

To: Greg Hollon <GHollon@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>; Tether Team <TetherTeam@schneiderwallace.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Please let us know when we can expect a response to the letter and search term counterproposal sent on October 12.

Going forward, please do **not** use the Tether_Litigation@rochefreedman.com distribution group. Instead, please use either TetherTeam@schneiderwallace.com, which goes to both attorneys and non-attorneys, or TetherLawyers@schneiderwallace.com, which goes only to attorneys.

Best regards,

Mitchell

Mitchell Nobel

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: he, him, his

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From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Wednesday, October 12, 2022 6:09 PM

To: Greg Hollon <GHollon@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Rudzin, Abby F. <arudzin@omm.com>; Daniel Stone <dstone@rochefreedman.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Please find attached Plaintiffs' search term counterproposal and a letter response addressing the discovery issues discussed during the parties' October 6, 2022 meet and confer.

Thank you for the information provided below. You'll note that we address our request for information regarding alternate messaging platforms used by Bittrex in the letter. We will consider Bittrex's response and will be prepared to discuss this issue, and any others, in further detail during the requested meet and confer.

Best,

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Greg Hollon <GHollon@mcnaul.com>

Date: Wednesday, October 12, 2022 at 5:13 PM

To: Campbell, Eamonn W. <ecampbell@omm.com>, Maya Jumper <mjumper@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Daniel Stone <dstone@rochefreedman.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya,

Following up on our last meet/confer, you asked about whether Bittrex uses Telegram. Bittrex does not use Telegram, and has no Telegram data for any of its employees (including for Mr. Shihara). Bittrex acknowledges that some employees may have used Telegram at various times, but it would not have been for official company business.

Since you flagged a Telegram chat that appeared to include Bill Shihara, we inquired as to his potential use of the Telegram. We are informed that he used it personally at times. However, he did not keep any of the data/chats, so would not have anything to produce (even if the company had an obligation to produce his personal information—a concept with which we don't necessarily agree).

I trust this answers your questions, but certainly let me know if you want to talk it over further.

Best, Greg

Juhjru| #M#K røq##D wæugh|



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From: Campbell, Eamonn W. <ecampbell@omm.com>

Sent: Monday, October 10, 2022 10:11 AM

To: Maya Jumper <mjumper@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

2.17.2015 - 10.06.2019 (see cell D4 in the general database excels and cell A7 in the Slack database excel)

Eamonn W. Campbell

O: +1-212-728-5878

ecampbell@omm.com

From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Monday, October 10, 2022 9:47 AM

To: Campbell, Eamonn W. <ecampbell@omm.com>; Rudzin, Abby F. <arudzin@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Thank you for this information, Eammon. What were the date limitations applied by Bittrex to the second hit report?

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

((@) mjumper@rochefreedman.com)

From: Campbell, Eamonn W. <ecampbell@omm.com>

Date: Friday, October 7, 2022 at 12:05 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Greg Hollon <GHollon@mcnaul.com>, Daniel Stone <dstone@rochefreedman.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya – We looked into your question about the discrepancy in the “Documents in searchable set” number in the two reports we’ve sent. The difference is because the first hit report we sent was run without any date limitations.

Best,
Eamonn

Eamonn W. Campbell

O: +1-212-728-5878

ecampbell@omm.com

From: Campbell, Eamonn W.

Sent: Thursday, October 6, 2022 2:46 PM

To: 'Maya Jumper' <mjumper@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

All – In advance of our call, attached are hit reports of our counter proposal for the time period we agreed. Also attached is a chart showing the terms and where we agree or disagree (the terms where we disagree are highlighted in orange).

Eamonn W. Campbell

O: +1-212-728-5878

ecampbell@omm.com

From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Tuesday, October 4, 2022 2:33 PM

To: Rudzin, Abby F. <arudzin@omm.com>; Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Abby,

Unfortunately, we have a hard stop at 4:30pm ET on Thursday and anticipate that the parties will need more than thirty minutes to discuss the outstanding issues.

Please let us know if your team needs to reschedule for another date this week.

Best,

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Rudzin, Abby F. <arudzin@omm.com>

Date: Tuesday, October 4, 2022 at 1:57 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Greg Hollon <GHollon@mcnaul.com>, Daniel Stone <dstone@rochefreedman.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Sorry, is there any chance we can do 4 instead? If not, I'll just be late to the party.

Abby

From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Tuesday, October 4, 2022 12:31 PM

To: Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Greg,

3:30pm ET on Thursday works for us. I will update the invite now.

Thanks,

Maya S. Jumper

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((@) mjumper@rochefreedman.com

From: Greg Hollon <GHollon@mcnaul.com>

Date: Tuesday, October 4, 2022 at 11:50 AM

To: Maya Jumper <mjumper@rochefreedman.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya, unfortunately that time does not work on our end. Is there a time between 2:30 and 4:30 Eastern on Thursday that works for you and your team?

Best, Greg

Juhjru| #M# rørg##D wæugh|



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From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Tuesday, October 4, 2022 8:27 AM

To: Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Thanks, Greg.

Unfortunately, Wednesday evening doesn't work on our end. Are you available on Thursday (10/6) at 10am ET?

Maya S. Jumper

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From: Greg Hollon <GHollon@mcnaul.com>

Date: Friday, September 30, 2022 at 4:01 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya,

Attached are the hit reports for the Slack data.

Regarding the meet/confer, I now have to cover a deposition on 10/5. The deposition is on the East Coast, and I expect it will be done early afternoon my time. Are you all available around 5 p.m. Eastern/2 p.m. Pacific for the conference?

Regards, Greg

Juhjru| #M# rørg#D wruqh |



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From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Tuesday, September 27, 2022 1:46 PM

To: Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Confirming receipt of the revised hit report. Thanks for the update on the Slack data hit report.

We are available to meet and confer on 10/5 at noon ET. If that time works for you, we can circulate an invite.

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New York, New York 10016

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(@) mjumper@rochefreedman.com

From: Greg Hollon <GHollon@mcnaul.com>

Date: Tuesday, September 27, 2022 at 12:19 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya,

FYI, for some reason the hit report I sent did not include Bill Shihara's documents. We asked Haystack to re-run the hit report including Bill Shihara's documents—the revised hit report is attached.

We are still working on getting the hit report for the Slack data. I hope to have that to you in the next few days.

For the meet/confer, our team has pretty good availability 10/4 and 10/5. Let us know a time or times that work for you on those days and we'll get it on the calendar.

Best, Greg

Juhjru| #M# r0rq##D w0rugh|



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From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Friday, September 23, 2022 5:24 PM

To: Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Confirming receipt of the hit report for custodian data in the current searchable set (exclusive of Slack messages). We will look out for the supplemental hit report next week.

In the meantime, we would like to get a meet and confer on the calendar for the week of October 3, 2022. Please let us know what dates work for you.

Thanks,

Maya S. Jumper

Associate

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New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greg Hollon <ghollon@mcnaul.com>

Date: Friday, September 23, 2022 at 4:51 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <tfitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya,

We have received a hit report on Wednesday for the custodian data that was uploaded by Haystack. The report is attached (I apologize for the delay in getting it to you—I was tied up with a summary judgment hearing on another matter that was heard this morning, so have been focused on that). As expected, the search terms yielded an unworkable number of hits, so we will need to work on narrowing the search terms to get to a workable volume of material for responsiveness review. We are exploring some proposed solutions on our end with respect to narrowing the search terms, and encourage your team to do the same.

Please note that this data is only a portion of the data we will have to review for responsiveness. Bittrex has used Slack to communicate for quite some time (both internally and externally) and we are working to get access to all of Bittrex's preserved Slack data, which I understand is voluminous. We expect to be in a position to run the search terms against that additional universe of data in the next few business days, and will provide you a hit report from that data as well. We will need to take that volume into account as well in determining what is a reasonable volume for responsiveness review.

Let me know if you have questions or want to talk anything over; otherwise, we'll be in touch once we get the Slack data hit report.

Best, Greg

Juhjru| #MK rørg##Dwæugh|



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From: Greg Hollon

Sent: Monday, September 19, 2022 11:29 AM

To: 'Maya Jumper' <mjumper@rochefreedman.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Maya,

Apologies for the delayed response. We were working through some of the issues last week and I didn't want to get back to you before having clarity on the status.

Last week we provided all of the data for the selected custodians to our selected vendor (Haystack). They ran into some issues processing the data into Relativity, but I am told that they will have everything uploaded into Relativity by tomorrow or Wednesday morning at the very latest. At that point, we should be able to quickly run the entire list of search terms (as modified by our prior discussions) and generate a comprehensive hit report. We can then identify any problem areas and try to work cooperatively to come up with a list of search terms that generates a reasonable volume that we can review for responsiveness.

As we discussed in our last call, we agreed to collect the data for the selected custodians from February 1, 2014 to June 5, 2020, and that is the universe of data that was provided to Haystack. But as we also made very clear (and as you all agreed), that did not constitute an agreement that the date of production will be through June 5, 2020. We continue to maintain that such a date range is significantly overbroad for production purposes with respect to Bittrex. However, before taking a final position, we need to review the hit report and get a sense of the overall volume. Depending on the volume, we may be more or less flexible on the date range.

We'll be in touch this week once we get the first hit report.

Regards, Greg

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From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Monday, September 19, 2022 8:35 AM

To: Greg Hollon <GHollon@mcnaul.com>; Daniel Stone <dstone@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>; Matt Monkress <mmonkress@mcnaul.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Please provide Bittrex's response to Plaintiffs' September 12 correspondence regarding outstanding discovery issues.

Thanks,

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Maya Jumper <mjumper@rochefreedman.com>
Date: Monday, September 12, 2022 at 11:57 AM
To: Greg Hollon <GHollon@mcnaul.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>
Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Thanks for this information, Greg.

With respect to search terms, the hit report you provided does not contain hit counts for all terms. Please provide a comprehensive report including hit counts for all terms. Upon receipt of the hit report, we will circulate a counterproposal addressing the disputed terms.

Please also confirm whether Bittrex agrees to search for and produce discovery through June 5, 2020, and whether any data/vendor issues remain that may impact Bittrex's production.

Maya S. Jumper

Associate

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((@) mjumper@rochefreedman.com

From: Greg Hollon <GHollon@mcnaul.com>
Date: Friday, September 9, 2022 at 4:42 PM
To: Daniel Stone <dstone@rochefreedman.com>, Maya Jumper <mjumper@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>
Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>, Matt Monkress <mmonkress@mcnaul.com>
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Dan,

Following up on this, I have confirmed that Bittrex did not maintain an organization chart during the time in question (Feb 2015 to June 2020). Though we don't have an organization chart, I obtained job titles and dates of employment for the seven custodians—see attached.

Let me know if you want to discuss this further.

Regards, Greg

Juhj ru| #M#K rørg##D wæugh|



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From: Greg Hollon

Sent: Friday, September 2, 2022 1:50 PM

To: Daniel Stone <dstone@rochefreedman.com>; Maya Jumper <mjumper@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Dan,

Thanks for your email. I don't believe we discussed an organization chart in our call. I'll need to discuss with my clients. Given the holiday weekend, I don't expect I'll be able to do so before Tuesday at the earliest. Once I talk with them, I'll get back to you. I hope you have a nice holiday weekend.

Regards, Greg

Juhjru| #M# rørg##D wæugh|



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From: Daniel Stone <dstone@rochefreedman.com>

Sent: Friday, September 2, 2022 10:48 AM

To: Greg Hollon <GHollon@mcnaul.com>; Maya Jumper <mjumper@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Hi Greg,

Thank you for providing this information. Our understanding from our call this week was that you would also be able to provide us with an org chart to assist us in evaluating your proposed custodians. Please provide that at your earliest convenience. Additionally, for those custodians you've identified, please provide their titles and date of employment.

Thank you and have a great holiday weekend.

Dan

Daniel M. Stone

Associate

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(t) 646.506.9375

(m) 203.962.2885

(@) dstone@rochefreedman.com

From: Greg Hollon <GHollon@mcnaul.com>

Date: Friday, September 2, 2022 at 12:33 PM

To: Daniel Stone <dstone@rochefreedman.com>, Maya Jumper <mjumper@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Dan,

Per our discussion earlier this week, Bittrex has identified the following as the appropriate custodians whose data should be collected for the purpose of running search terms. It sounds like there are still some complexities in the Bittrex system with respect to isolating the specific custodian data that we are working through, but we hope to get that sorted out next week and get the data to a vendor as we discussed in our call. Here are the custodians we identified:

1. Bill Shihara
2. Rami Kawach
3. Richie Lai
4. Ryan Hentz
5. John Roth
6. Kiran Raj
7. Moriah Kairouz Batza

As always, let me know if you want to talk anything over.

Best, Greg

Juhjru| #K rarg#D wruh |



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From: Daniel Stone <dstone@rochefreedman.com>

Sent: Tuesday, August 23, 2022 8:22 AM

To: Greg Hollon <GHollon@mcnaul.com>; Maya Jumper <mjumper@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>; Elisabeth J. Guard <eguard@mcnaul.com>; Campbell, Eamonn W. <ecampbell@omm.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Hi Greg,

Please send us the hit reports and let us know your availability for a meet and confer later this week.

Best,

Daniel M. Stone

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(t) 646.506.9375

(m) 203.962.2885

((@) dstone@rochefreedman.com)

From: Daniel Stone <dstone@rochefreedman.com>

Date: Thursday, August 18, 2022 at 7:15 PM

To: Greg Hollon <GHollon@mcnaul.com>, Maya Jumper <mjumper@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Greg,

Thank you for resending the correspondence below. We have reviewed the letter and the search terms and attach a spreadsheet detailing our proposed responses going forward. As you will see, we are willing to forgo pressing forward with a number of terms but would ask that you run the hit reports for the remainder that you assert are overbroad so we can determine whether they are actually overbroad or whether they are not hitting on substantial numbers of documents. Ideally, we would like to schedule a meet and confer with you early next week once you have provided that hit report. We would propose Wednesday afternoon for the meet and confer if you can provide the hit reports next Monday.

Thank you,

Daniel M. Stone

Associate

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(m) 203.962.2885

((@) dstone@rochefreedman.com)

From: Greg Hollon <GHollon@mcnaul.com>

Date: Tuesday, August 16, 2022 at 6:38 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Daniel Stone <dstone@rochefreedman.com>, Rudzin, Abby F. <arudzin@omm.com>, Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>, Tether Litigation

<Tether_Litigation@rochefreedman.com>

Cc: Lisa Nelson <LNelson@mcnaul.com>, Elisabeth J. Guard <eguard@mcnaul.com>, Campbell, Eamonn W. <ecampbell@omm.com>

Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL SENDER]

Maya,

We sent out a letter a month ago with a detailed response (see attached) and have been waiting to hear back. Please review our response and get back to us after you have considered the response. FYI, I am not available to meet and confer this week, but will be available next week.

Regards, Greg

Juhjru| #K rorg##D wruh|



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From: Maya Jumper <mjumper@rochefreedman.com>

Sent: Tuesday, August 16, 2022 3:18 PM

To: Daniel Stone <dstone@rochefreedman.com>; Rudzin, Abby F. <arudzin@omm.com>; wpao@omm.com; Greg Hollon <GHollon@mcnaul.com>; Timothy B. Fitzgerald <TFitzgerald@mcnaul.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>

Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Counsel:

Plaintiffs have not received a response from Bittrex regarding Plaintiffs' search term proposal. Please advise whether Bittrex agrees to run the search terms proposed by Plaintiffs or intends to provide a counterproposal. If disputes remain regarding Bittrex's use of search terms, we are available to meet and confer this week.

Regards,

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From: Daniel Stone <dstone@rochefreedman.com>

Date: Friday, May 13, 2022 at 4:16 PM

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Subject: Re: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Counsel,

For the purposes of demonstrating our approach, I attach our search terms and hit reports. I also note that the list below contains one error: the 17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye wallet was not listed in the Griffin Report, but instead is another wallet that received \$22M from 1Co1d and sent it along to the Poloniex hot wallet as the sole transaction.

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From: Daniel Stone <dstone@rochefreedman.com>

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Subject: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

Counsel,

Pursuant to our meet and confer, please find attach Plaintiffs' proposed search terms.

Below, please find a description of the wallet addresses that are referenced in Plaintiffs' RFPs:

- 1LSgEKji3ZoGdvzBgkCJMej74iBd38fySb - identified in the Griffin Report as a central wallet in the scheme.
- 1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g - Bitfinex exchange address in Griffin Report
- 3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r - Bitfinex cold wallet in Griffin Report
- 12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P - Poloniex wallet in Griffin Report
- 13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv - Bittrex wallet in Griffin Report
- 1N52wHoVR79PMDishab2XmRHsbekCdGquK - Bittrex wallet in Griffin Report
- 1DEcTtkrbdXsS1wbrMvzub5X4VpByYmAwo - Poloniex wallet in Griffin Report
- 1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA - Bittrex wallet in Griffin Report
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh - Bitfinex's Tether Address in Complaint
- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw - Bitfinex's Tether Address in complaint
- 1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g - Bitfinex exchange address in Griffin Report
- 3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r - Bitfinex cold wallet in Griffin Report
- 1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX – Heavily implicated in the scheme described in the Griffin Report
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLxtbUru - Bittrex Wallet in complaint
- 13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv - Bittrex wallet in Griffin Report
- 1N52wHoVR79PMDishab2XmRHsbekCdGquK - Bittrex wallet in Griffin Report
- 1AA6iP6hrZfYiacfb3VS5JoyKeZZBEYRW - Wallet mention in Complaint
- 1Po1oWkD2LmodfkbYiAktwh76vkF93LKnH - Poloniex wallet mentioned in Complaint
- 17A16QmavnUfCW11DAApiJxp7ARnxN5pGX - Poloniex wallet in Griffin Report
- 12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P - Poloniex wallet in Griffin Report
- 1DEcTtkrbdXsS1wbrMvzub5X4VpByYmAwo - Poloniex wallet in Griffin Report

- 1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA - Bittrex wallet in Griffin Report
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9 - wallet in complaint
- 3MbYQMMmSkC3AgWkj9FMo5LsPTW1zBTwXL - Tether authorizer in Griffin Report
- 3BbDtxBSjgTRxaBUgR2JACWRukLktZdiQ - Tether treasury in Griffin Report
- 1NTMakcgVwQpMdGxRQnFKyb3G1FAJysSfz - Tether treasury in Griffin Report
- 16tg2RJUEPtZooy18Wxn2me2RhUdC94N7r - address of 2017 hack of Tether, in response to which, Tether claimed all reserves remained 1:1 backed, but it would not redeem these Tether
- 1Fd3iQDDA6mJV0AV4ZcqqVFe1MX97EZoD - regularly transacts with 1Dub wallet?
- 1KBXtTQnEgU34xXchwvmAoX7o5qZAp3xF - regularly transacts with 1Dub (Bittrex) wallet – often hundreds of thousands tether. Also, millions from Bitfinex (1ky1) to 1Dub
- 17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye - wallet listed in Griffin Report
- 1A6yDZj1241qtGzEeQWRaptxVEhzz5owLP - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1A9AUhKv6aLrKGAdwMM9aHXCZM9uQivZK - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1AanEM2PU6GS7krwxaysKP3scwb3fdioyE - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1CEZ4sjk7MUT3LSJi7bRvzbMZvGLWKCaiG - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1Co1dhYDeF76DQyEyj4B5JdXF9J7TtfWWE - Poloniex cold wallet
- 1G6jMfQotd6rV8VkMFNx4hPXYHioeBdquf - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1H48Bp7EGELgnGSVYKdiCuSo6n822mVmHg - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1Hi1hyJpUeETGBTQ8aPZ69GBL8xBVV53XP - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1LjvsEN9ZzeBVPB4Xbhs7mxg99gBAPoMB - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1NUyryQe1cQYmqg5bjwWNFXA8T1M6htSQ - received \$22M Tether from 1Co1d and sent to Poloniex hot wallet – only transaction of this wallet
- 1J8fgfPwn4dsxLiA5BnUkzHoubPJ6q5q8g - Address received millions in Tether from Bitfinex (1KYi) and sent all to Poloniex – appears to be all the account did
- 1F6nNgCTLcR4abWuMs1CHUWYNcnJ47tvbc - Address received millions in Tether from Bitfinex (1KYi) and sent all to Poloniex – appears to be almost all the account did
- 15ovrfyRTbhqeUkgAqAwtsCXDASmietmCJ - Address received millions in Tether from Bitfinex (1KYi) and Bittrex (1Dub) and sent all to Poloniex – appears to be almost all the account did

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